## 60491

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To: 9-NPRM-CMTS

**Priority:** Normal

Subject: 180 day (or 6 month) repacks

FAA-99-5483-56

As a sport parachutist I believe the reserve repack cycle defined in FAR 105.43 should be lengthened to 6 months for these reasons:

- 1. Modern day fabrics and construction techniques makes it unnecessary to inspect reserves as often.
- 2. Tests by parachute industry experts have found that handling and repacking of reserve parachutes actually weakens and degrades their performance, thus a longer repack cycle enhances the safety of the reserve.
- 3. Several countries have instituted the 180 day or 6 month reserve cycle and found no decrease on safety.
- 4. A 6 month cycle instead of 180 days simplifies paperwork (eliminates counting days and possible mistakes by riggers or FAA inspectors), adds very few days, and is typical of how the FAA designates time periods in other areas of aviation. Examples are pilot biennial reviews, pilot medicals, aircraft annual inspections.

Thank you.

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